

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of

<b>MOBILE RELAY ASSOCIATES</b>	)	WT Docket No. 14-34
	)	
To Operate on Frequency Pairs 451/456.0000 MHz,	)	Public Notice, DA 14-258
451/456.00625 MHz and 451/456.0125 MHz at	)	
Multiple Locations in the Los Angeles, Las Vegas, and	)	
Miami Metropolitan Areas	)	

To: Chief, Wireless Telecommunications Bureau

**SUPPORTING COMMENTS FROM  
AIR SPECTRUM, INC.**

Air Spectrum, Inc. ("Air Spectrum"), pursuant to the Public Notice, DA 14-258, released February 26, 2014 ("*Request for Comments Notice*"), hereby submits its Comments in support of the pending applications by Mobile Relay Associates ("MRA") to operate PMRS facilities using a very-narrowband 4 kHz emission designator on frequency pairs 451/456.0000 MHz, 451/456.00625 MHz and 451/456.0125 MHz in the Los Angeles, Las Vegas and Miami metropolitan areas.

**AIR SPECTRUM'S INTEREST**

Air Spectrum operates a Private Mobile Radio Service ("PMRS") network in metropolitan Miami. Air Spectrum, either directly or through affiliates, holds a number of Commission authorizations.<sup>1</sup> Air Spectrum cooperates with MRA and provides service to MRA's Florida-based subscribers. If MRA were licensed in the Miami area as proposed, Air Spectrum would be in position to sell as an agent for MRA with respect to this new capacity as

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<sup>1</sup> Air Spectrum's facilities are not connected to the Public Switched Telephone Network. End user units typically do not have dial-pads. Air Spectrum's subscribers are commercial and governmental institutions, such as local governments, bus companies, and fleet operators.



well as to perform maintenance and similar services to MRA for its Miami facilities. Moreover, because there is a shortage of viable spectrum in the 450-512 MHz band in the Miami area, and because that spectrum band is highly desirable, due to both its propagation characteristics and the availability of quality equipment at reasonable prices, Air Spectrum and all PMRS industry participants in the Miami area have an interest in this proceeding.

**I. There Is No Spectral Overlap, and So No Interference to Existing Licensees**

There have been great strides in the evolution of narrowbanding; strides reflected in the new Part 90 rules but not yet reflected in assessing where and how much of a buffer between separate radio services is appropriate. The Commission now permits separate Part 90 licensees to be licensed closer together than before, without any fear of harmful interference because with the new narrowbanding, there is no spectral overlap between adjacent licensees.

Channels can now be licensed as 4 kHz occupied-bandwidth channels for I/B usage. Air Spectrum is using some of this 4 kHz digital equipment, and it provides excellent quality. This is true even where the spectral separation is 1 kHz or less. MRA's proposed spectral separation is much more than 1 kHz; there would be no chance of interference to incumbent users.

**II. There Is Significant Congestion in Miami**

There is a shortage of 450-512 MHz spectrum in Miami. Therefore, anything which increases the pool of available 450-512 MHz spectrum in the Miami area is consistent with the public interest. The grant of the MRA application for Miami would do just that.

**CONCLUSION**

In summary, thanks to the availability of very-narrowband 4 kHz equipment in this band for PMRS use, the Commission can now issue a license to MRA for the requested channels in the Miami metro area without causing any interference or other problems for any incumbent



Commission-regulated operations, whether in Part 90 or other rule parts. The Miami area is highly congested, with virtually no PMRS 450-470 MHz spectrum left available.

Accordingly, the Commission should grant the limited rule waiver which MRA seeks herein, and issue MRA a license to use the requested channels in Miami.

Respectfully submitted,  
**AIR SPECTRUM INC.**

March 20, 2014

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